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February 7, 2020

REF:

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VIA ECF

Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Rodriguez v. City of New York et al.*, No. 18-cv-4805 (NRB)

Dear Judge Buchwald:

Our firm represents plaintiff Giovanni Rodriguez in the above-referenced matter. We write, jointly with counsel for defendants and pursuant to Your Honor's request following the February 5, 2020 oral argument, to provide a proposed discovery schedule. The parties propose the following schedule:

Rule 26 Disclosures due by February 28, 2020
Exchange of Document Requests and Interrogatories due by March 13, 2020
Close of Fact Discovery June 30, 2020

We appreciate Your Honor's continued attention to this matter.

Respectfully,


Keith Szczepanski

So Ordered.
Kami
Naomi Reice Buchwald
2/11/20
USD

cc: Amy J. Weinblatt (via ECF)
Amatullah Booth (via ECF)
Counsel for Defendants